

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Pasz Auf Film, Inc.,

Docket No. 07 Civ. 7021 (PKL)

Plaintiff

v.

ANSWER

Manuel Parrish,

Defendant.

The defendant, Manuel Parrish, by his attorney, Ravi Ivan Sharma, answers plaintiff's complaint as follows:

DENIALS

1. Defendant denies each and every allegation contained in paragraphs 3, 14, 17, 19, 20, 22, 23, 24, 25, 26, 28, 29, and 30 of the complaint.

DENIALS BASED ON LACK OF INFORMATION

2. Defendant lacks sufficient information to form a belief, or the paragraphs are assert multiple claims and, or are unintelligible and, or require expert conclusions of law to properly answer and therefore denies the allegations contained in paragraphs 1, 4, 5, 6, 7, 8, 12, 13, 16, 18, 21, 24, and 27 of the complaint.

ADMISSIONS

3. Defendant admits the allegations contained in paragraphs 2, 9, 10, 11, 12, and 15 of the complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

4. The Complaint fails to state a cause of action.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

3. There is no subject matter jurisdiction of this action by this court. The amount in controversy is not greater than \$75,000.00.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

5. The action and, or recovery are barred by the doctrine of latches.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

6. The action and, or recovery is barred by the statute of limitations.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

7. The action and, or recovery is barred by the doctrine of waiver.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

8. The action and, or recovery is barred by the doctrine of estoppel.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

4. The defendant was not properly served.

AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE

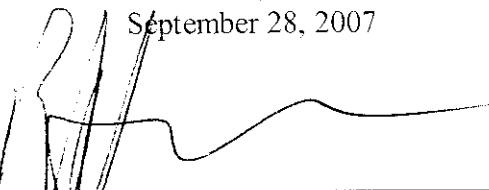
5. Defendants hereby give notice that he intends to rely upon such other affirmative defenses as may become available or apparent during the course of discovery and thus reserves the right to amend his Answer to assert such defenses.

DEMAND FOR JUDGMENT

6. Defendant therefore requests that judgment be entered as follows:

- A. that Plaintiff take nothing;
- B. for Defendant on all claims presented by Plaintiff;
- C. that Defendant be awarded its costs [if applicable, add: attorneys' fees] and other disbursements in connection with the defense of this suit; and
- D. for any other relief to which Defendant is entitled.

Dated: New York, New York
September 28, 2007


Ravi Ivan Sharma (RS2064)
Attorney for Defendant, Manuel Parrish
404 Park Avenue South, 14th Floor
New York, NY 10016
(212) 686-3434 x212

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Plaintiff,

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PROOF OF SERVICE

Manuel Parrish,

Defendant.

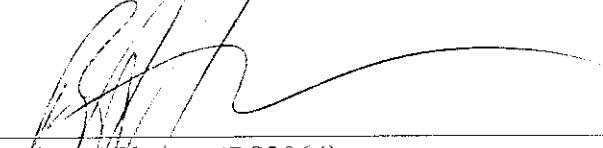
RAVI IVAN SHARMA, an attorney duly admitted to practice before this court and in the State of New York, affirms under penalty of perjury as follows:

On October 1, 2007, I caused a true and correct copy of the foregoing **Answer** to be served via FIRST CLASS MAIL AND FAX to counsel for Plaintiff at the below address:

Jennifer McRedith
Meredith & Keyhani, PLLC
330 Madison Avenue, 6th Floor
New York, NY 10017
Fax: 212 292 3819

Dated: New York, New York

October 1, 2007


Ravi Ivan Sharma (RS2064)
Attorney for Defendant, Manuel Parrish
404 Park Avenue South, 14th Floor
New York, NY 10016
(212) 686-3434 x212